APPENDIX A.

Section 284 (b) (1) of the Revenue Act of 1926 provides in part as follows:

"(b) Except as provided in subdivisions (c), (d), (e), and (g) of this section—

"(1) No such credit or refund shall be allowed or made after three years from the time the tax was paid in the case of a tax imposed by this Act, nor after four years from the time the tax was paid in the case of a tax imposed by any prior Act, unless before the expiration of such period a claim therefor is filed by the taxpayer; * * *"

Article 1305, Regulations 69, promulgated under the Revenue Act of 1926, provides in part as follows:

"(A) Except as provided in subdivisions (B), (C), (D), and (E) of this article, the Commissioner is prohibited from making credits or refunds of income and profits taxes after three years from the time the tax was paid in the case of a tax imposed by the Revenue Act of 1926, or after four years from the time the tax was paid in the case of a tax imposed by any prior Act, unless before the expiration of such three or four year periods a claim therefor is filed. The amount of such credit or refund shall not exceed the portion of the tax paid during the three or four year period, as the case may be, immediately preceding the date of the allowance of the credit or refund, or if the credit or refund is based upon a claim, the amount of the credit or refund shall not exceed the portion of the tax paid during the three or four year period immediately preceding the date of filing such claim."